IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF HAWAII

UNITED STATES OF AMERICA,	)	CR. NO. 05-00070 DAE
	)	
Plaintiff,	)	DEFENDANT'S MOTION TO
	)	MODIFY TERMS OF BAIL
vs.	)	
	)	
PEARLIE LOU MOORE, (02)	)	
aka Pearlie Lou Langaman,	)	
aka Pearlie Lai Langaman,	)	
	)	
Defendant.	)	
	)	

DECLARATION OF COUNSEL

1.   I, EMMANUEL G. GUERRERO, represent the Defendant in

the above-entitled case.

2.   Defendant respectfully request that the condition of Bail

whereby Defendant posted her real property as surety in the amount of $50,000.00

to secure her release as follows:

a.   Defendant has secured a buyer for her real property, of

which she co-owns with her husband, Gary Moore.

b.   That after all expenses related to the sale of the property,

including existing mortgages and cost of the sale,

Defendant and her husband expect to have net proceeds in

excess of $75,000.00.

    c.   That Defendant seeks to set aside said condition so that

the property can be sold.

    d.   With the proceeds of the sale, Escrow will be instructed

that $50,000.00 be forwarded to the this Court to cover

said bail amount of $50,000.00.

    3.   That Counsel has spoken with AUSA Beverly Wee Sameshima and

the Pre-Trial Services of this request to modify the terms of Bail.

    4.   I declare under penalty of law that the foregoing is true and

correct.

DATED: Honolulu, Hawaii,__02/14/2006__ .

EMMANUEL G. GUERRERO
Attorney for Defendant

<u>CERTIFICATE OF SERVICE</u>

I hereby certify that a copy of the foregoing document was duly served via

Personal Service by and through *Akamai Legal Messenger Services* upon the

following persons on February 15, 2006 as

As forth below:

        BEVERLEY WEE SAMESHIMA
        Assistant United States Attorney
        Room 6100, PJKK Federal Building
        300 Ala Moana Boulevard
        Honolulu, Hawaii 96850
        Attorney for Plaintiff U.S.A.

        United States Pretrial Services Office
        Room 7-222, PJKK Federal Building
        300 Ala Moana Boulevard
        Honolulu, Hawaii 96813

        DATED: Honolulu, Hawaii,_ 02/14/2006 _.

               EMMANUEL G. GUERRERO
               Attorney for Defendant